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July 23, 2015

BY ECF & E-MAIL

The Honorable Katherine B. Forrest, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1950
New York, NY 10007
ForrestNYSDCChambers@nysd.uscourts.gov

Re: *Belardinelli et al. v. Concepts in Staffing, Inc. et al.*
Case No.: 15-cv-4935

Dear Judge Forrest:

We are the attorneys for the Plaintiffs in connection with the above-referenced case, and we write in response to the Defendants' letter of July 22, 2015, addressed to Your Honor.

As we previously advised Defendants' counsel (Mr. Vogel), the Plaintiffs are indeed agreeable to an extension of time for Defendants to file their answer. The outstanding issue that was discussed between counsel was whether Mr. Vogel would accept service on behalf of the two individual Defendants. Specifically, we had requested that Mr. Vogel accept service on behalf of the individual Defendants, who Mr. Vogel now acknowledges he represents in connection with this action.

Mr. Vogel has previously represented to us that his clients have insufficient assets to pay the unpaid wages we believe are owed to our clients. Accordingly, we believe it would be helpful to keep Tuesday's conference as currently scheduled so that the Court may assist the parties in an effort to resolve the case without the need for any unnecessary litigation and to otherwise move forward expeditiously.

Thank you Your Honor for your consideration in this matter.

Respectfully submitted,



Jason B. Klimpl

cc: Bernard H. Vogel, Esq. (by e-mail)